

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Indian Health Service
Rockville, Maryland 20852

Refer to: DAS

INDIAN HEALTH SERVICE CIRCULAR NO. 2002-XX

INDIAN HEALTH SERVICE TELEPHONE USE

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1. **PURPOSE.** This Circular provides guidance on the use of Government-owned, Government-leased, and Government-managed telecommunications systems, cellular telephones, Federal Calling Cards, and pre-paid calling cards. The Circular also addresses cost recovery procedures and other management considerations.
2. **BACKGROUND.** The Information Technology Management Reform Act and the Government Performance and Results Act have changed the Government's perspective on Information Technology Management. The regulatory changes have resulted in increased competition and rapid technological developments. These changes have improved administrative efficiency, effectiveness, and ability to meet mission requirements in remarkable ways. As a result, many telecommunications services and products have improved and are now available at low cost.

3. **POLICY.** Telecommunications services and systems are Government resources, and as such, must be managed in the most cost-effective manner possible and in the interest of the Government. Telecommunications services are used to support the mission of the IHS. Reasonableness and common sense shall be the guiding principles in all situations. This policy applies to all Indian Health Service (IHS) employees and covers contractors unless they are specifically excluded under the terms of their contract. Indian Health Service managers have flexibility in determining how this policy can be achieved and may accommodate employee personal needs to the extent they are not inconsistent with agency needs.

4. **RESPONSIBILITIES.**

- A. **Telecommunications Managers.** Telecommunications managers are responsible for reviewing telecommunications bills, billing exception reports, financial system cost data, and other similar information. Telecommunications managers shall identify method(s) for determining when telecommunications bills will be reviewed more closely:

- (1) Sampling methodology.
 - (2) Screening techniques.
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B. Managers. Managers must:

- (1) Define and implement office practices consistent with this Circular.
- (2) Define and implement reasonable dollar thresholds for telecommunications bills.
- (3) Consider all viable alternatives and the need and opportunity for inter-operation and compatibility with public and Government telecommunications systems and services when acquiring telecommunications resources.
- (4) Provide telecommunications support and services at a minimum total cost consistent with requirements for capacity, inter-operability, **and** reliability.
- (5) Ensure the IHS shares telecommunications systems, services, and facilities with other agencies to the maximum extent practical, when sharing is cost effective.

C. Supervisors. Given the relatively low cost of modem telecommunications

services, supervisors need not perform detailed reviews of bills as long as the criteria for dollar thresholds are met. Supervisors are responsible for:

- (1) Reviewing telecommunications bills.
- (2) Investigating and resolving billing irregularities which exceed established dollar thresholds.

5. PROCEDURES.

A. Personal Calls Made from Government Teleuhones. Personal calls made from Government telephones must:

- (1) Not adversely affect the performance of employee's official duties or the organization's work performance.
- (2) Be of reasonable duration and frequency.
- (3) Not reasonably have been made during non-duty hours.

B. Purely Personal Calls. Employees may make and receive a limited number of purely personal calls during duty hours (purely personal calls are those determined

not to be necessary in the interest of the Government) from Government telephones when those calls do not incur additional charges to the Government. Employees shall not make purely personal long-distance calls expecting to reimburse the Government later. When an employee makes a purely personal calls, employees shall ensure that:

- (1) All long-distance calls are made at their own expense; e.g., charged to personal calling or credit cards, home telephones, or other non-Government telephone numbers.
- (2) Any purely personal call does not adversely affect the performance of official duties or the organization's work performance.
- (3) All purely personal calls are of reasonable duration and frequency.

C. Using Government-Provided Telecommunications Resources. Employees shall use Government-provided communications equipment and services for official business, but may make and receive personal calls during duty hours that are necessary and in the interest of the Government. Examples of personal calls that are in the interest of the Government are:

- (1) Calls to alert household members about working late or other schedule
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changes.

- (2) Calls to make alternative child care arrangements.
- (3) Calls to talk with doctors, hospital staff, or day care providers.
- (4) Calls to determine the safety of family or household members, particularly in an emergency.
- (5) Calls to make funeral arrangements.
- (6) Calls to reach businesses or Government agencies that can only be contacted during work hours.
- (7) Calls to arrange emergency repairs to vehicles or residences.

D. Telephone Call Duration and Frequency. Supervisors and managers shall determine, based on employees' work schedule, co-worker needs, office work demands, length of work day, etc, whether brief personal telephone calls are of reasonable length, and in the interest of the Government. More than three personal calls a day, each lasting more than 10 minutes in duration is considered an unreasonable length.

- E. Federal Calling Cards/Pre-Paid Calling Cards. Employees who frequently travel must obtain and use a Federal Calling Card to make authorized calls. Federal Calling Cards can only be ordered by ordering agents who are IHS Designated Agency Representatives (DAR). For network security reasons, Federal Calling Cards should be in the individual's name, and should not be shared. Typically, this precludes assigning cards by specific office, position, or other designated title. Offices must track all Federal Calling Cards and cancel them when employees terminate. Regaining physical possession of the card is insufficient control.
- F. Lost or Stolen Federal Calling Card. If a Federal calling card is lost, stolen, or otherwise compromised, the employee must promptly report the incident to the vendor using the toll-free number on the reverse of the card, or to the provider's toll-free number obtained from directory assistance. In addition, the ordering DAR must be notified. Employees will not be held liable for unauthorized calls made by unknown third parties if the lost or stolen cards are reported promptly.
- G. Cellular Telephones and Wireless Telecommunications Services. Wireless services, such as intelligent pagers, satellite phones, cellular, and Personal Communications Systems (PCS) technology, shall be used and managed as a telecommunications service and a IHS resource. Wireless equipment and services shall be ordered when there is a business need for calls to be made or received
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while the employee is away from their office. Wireless technologies may also offer affordable emergency backup telephone services. When ordering wireless services, care must be taken to analyze all billing options to ensure the most economical billing plan is selected and based on business use of the service. Periodically, billing plans shall be reviewed and compared to newer and usually more economical plans. Applicable roaming charges need to be considered and factored as part of the analysis.

- (1) Employees shall be particularly diligent and use wireless services only when required to do so for official business or when the calls are in the interest of the Government.
 - (2) Employees should use non-wireless services if they are readily available.
 - (3) Employees should not expect reimbursement when using personal wireless services for Government business without prior approval of managers and supervisors.
 - (4) If an office's employees have recurring needs for wireless services and if cost-benefit reviews support the requirement, the office should consider acquiring Government-owned wireless technologies that can be checked out or assigned employees on an as-needed basis.
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H. Use of Government Telecommunications Resources When Traveling.

- (1) Official Business Calls. Employees are expected to use Federal Calling Cards for long-distance calls while on official travel. Use of cellular telephones is allowable to conduct Government business while on travel. Supervisors should ensure that Federal Calling Cards are provided personnel who travel.
- (2) Calls Home. Employees on official overnight travel status are allowed to make a brief daily personal call but they should do so using least-cost-to-the-Government methods, such as, by using available Government telephones and Federal Calling Cards. Employees may be reimbursed on travel vouchers for daily personal calls charged to hotel rooms but these calls should not normally be made in this manner because of their high costs.
- (3) Calls To Other than to Home. Other necessary long-distance calls may be made using Government-provided calling cards. These are calls that must be made before employees return from travel. In most cases, these calls would have been made from home or office phones if the employees were not in travel status.

- (4) Calling Home using Cellular Telephones. Except in unusual circumstances, wireless services shall not be used to telephone home, or to make calls listed in the first paragraph under "Guidelines," at Government expense, when on official travel.
- (5) Calls from Commercial Airplanes. Calls from commercial aircraft must be approved prior to travel on the employee's travel authorization. If specifically authorized to do so for business purposes, employees should make domestic airborne calls using Government travel cards or Federal Calling Cards.
- I. Directory Assistance Calls. Employees are encouraged to use telephone directories or Internet directory web sites to determine business-related telephone numbers rather than routinely calling fee-based directory assistance operators.
- J. International Calls. All IHS offices shall use cost-effective telecommunications services to contact locations outside the contiguous United States and overseas. Access to international telephone services should be restricted to only those employees who require such services as part of their official duties.
- K. Telephones in Homes. Government regulations generally do not allow installation

of telephone services or equipment, including data lines, in private residences at Government expense unless employees are working under approved Flexiplace or Work-at-Home Agreements.

- L. Employment Changes. Upon leaving Government service or transferring to another agency, IHS employees must return Federal Calling Cards, pre-paid calling cards, wireless devices, **and** all other Government issued equipment to their respective supervisor. **(See Circular No. 2002-XX, "Clearance of IHS Personnel for Separation or Transfer.")**
- M. Telecommunications Use and Electronic Commerce and Administrative Support Systems. Whenever possible, **MS** offices shall use electronic ordering and billing practices for procuring telecommunications services and products, and consolidate telecommunications bills. These practices support the IHS's electronic commerce goals and improve administrative efficiency.
- N. Telecommunication Problems. Telecommunications problem indicators typically include:
- (1) Widely varying monthly bill totals.
 - (2) Large numbers of non-Government calls.
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- (3) Long or repeated calls made before and after work hours.
- (4) Large numbers of directory assistance calls.
- (5) Long hold time calls (callers left on hold for extended periods) should also be reviewed to determine if they are transmissions that could be aggregated or redirected to reduce costs.

O. Telecommunications Abuse. When telecommunications abuse occurs, there are two concurrent considerations:

- (1) The recovery of **MS** charges and administrative costs to rectify telecommunications management program abuses.
- (2) Disciplinary action for misconduct in accordance with applicable regulations.

P. Cost Recover. for Unauthorized Teleuhone Calls. Employees making unauthorized long distance or cellular telephone calls may be charged for the cost of the call, rounded to the nearest dollar, plus associated administrative recovery costs if the calls are determined to be egregious. All IHS managers and

supervisors should consult with their servicing Human Resources Office to make these determinations.

(1) Reimbursements.

- a. Emulovee: Reimbursements shall be made by personal check or money order, payable to the **MS**, and forwarded to the IHS finance office for deposit.
- b. Finance office: Include with any deposit a memorandum indicating that payment is for reimbursement of personal use of telecommunications chargeable resources and associated administrative costs, if applicable.

Q. Disciplinary Action. Employees making unauthorized long distance or cellular telephone calls may be subject to disciplinary action for misconduct. The action may be pursued, up to and including removal from office. Supervisors should consult with their serving Human Resources Office to determine appropriate corrective action.

6. SUPERSEDURE. None

7. EFFECTIVE DATE. This Circular is effective on date of signature.

Charles W. Grim, D.D.S., M.H.S.A.

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